

Attachment 4

Table 1: Dollar volumes of subject drugs purchased directly by Massachusetts TPPs, by manufacturer

Manufacturer	Time coverage of available data	BCBS-MA ¹	CIGNA ²	Fallon ³	Harvard Pilgrim ⁴
AstraZeneca	91-04		\$1,416,150	\$1,275,699	\$1,231,925
Bristol-Myers Squibb	93-02	\$138,389	\$1,099,332	\$942,688	\$706,249
Johnson & Johnson	91-99	\$511,377	\$3,595,116	\$1,077,477	\$1,172,335
Schering-Plough	91-04	\$96,549	\$5,178,432	\$2,591,897	\$2,048,990
Total		\$746,314	\$11,289,030	\$5,887,762	\$5,159,499

Source: AstraZeneca, Bristol-Myers Squibb, Johnson & Johnson, and Schering-Plough indirect sales data.

¹ I include all purchases in which plaintiff BCBS-MA or its related entities are listed as customers or contract owners in manufacturer chargeback data. Plaintiff BCBS-MA-related entities purchasing subject drugs directly from manufacturers include HMO Blue, Medical East, and Medical West.

² I include all purchases in which CIGNA or its related entities are listed as customers or contract owners in manufacturer chargeback data. CIGNA-related entities purchasing subject drugs directly from manufacturers include CIGNA Healthplan, CIGNA Pharmacy, Connecticut General Life Insurance Company, INA Healthplan, Lovelace, Tel-Drug, EQUICOR, and Healthsource.

³ I include all purchases in which Fallon or its related entities are listed as customers or contract owners in manufacturer chargeback data. Fallon-related entities purchasing subject drugs directly from manufacturers include Fallon Community Health Care, Fallon Clinic, and Fallon Central Pharmacy.

⁴ I include all purchases in which Harvard Pilgrim or its related entities are listed as customers or contract owners in manufacturer chargeback data. Harvard Pilgrim-related entities purchasing subject drugs directly from manufacturers include Harvard Pilgrim Healthcare, Harvard Community Health Plan, Harvard Vanguard, and Rhode Island Group Health (also known as Harvard Community Health Plan of New England).

Defendants' Exhibit

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